

**Nutter, McClennen & Fish, LLP**

Seaport West  
 155 Seaport Boulevard  
 Boston, MA 02210-2604  
 (617) 439-2000

Client No.: 0104614

September 28, 2012

Resp. Atty.: PJA

Bill No. 439261/03SLW

Sovereign Bank New England  
 75 State Street  
 Boston, MA 02109

Attention: John P. Bowen, Vice President

FOR PROFESSIONAL SERVICES rendered and unbilled through August 31, 2012 in connection with the following:

**Matter Name:** Global Broadcasting of Southern New England LLC  
**Matter No.:** 00051

**Billing Contact:** Paul J. Ayoub, Esq. (Telephone no.: 617-439-2270)**Cost Center:** 8413 - Other LLB Workout

<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
08/01/12	Attention to O'Brien deposition	JFC	0.50
08/03/12	Attention to Notice of Taking Deposition	JFC	0.20
08/06/12	Review Defendants' Rule 26 disclosures and document requests; review pleadings	JDP	1.30
08/06/12	Attention to O'Brien document request and Rule 26 disclosures	JFC	1.20
08/07/12	Draft Rule 26(a) initial disclosures and requests for production; review pleadings and receivership filings	JDP	4.70
08/07/12	Attention to discovery issues	JFC	0.70
08/08/12	Draft interrogatories and requests for admission	JDP	1.30
██████	██	██████	██████
08/08/12	Attention to counterclaim issues; emails regarding same	JFC	0.20
██████	██	██████	██████
08/09/12	Finalize drafts of initial discovery; review J. Coffey comments	JDP	0.50
08/09/12	Attention to counterclaim; review discovery propounded to the bank; discussion with B. Mack; email to J. Bowen; review and revise proposed discovery to K. O'Brien; attention to email form A. Weiner	JFC	3.50
08/10/12	Revisions to initial discovery	JDP	0.30

PAYMENT DUE UPON RECEIPT  
 BALANCES OVER THIRTY DAYS ARE SUBJECT TO A MONTHLY FINANCE CHARGE OF ONE AND ONE HALF PERCENT  
 FEDERAL TAX ID: 04-2106505

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<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
08/10/12	Attention to discovery issues	JFC	0.30
08/13/12	Revisions to initial discovery	JDP	0.20
08/16/12	Attention to discovery issues	JFC	0.50
08/20/12	Email from J. Bowen regarding status; follow up regarding same; email from S. Morris with instructions to proceed	JFC	0.60
08/21/12	Attention to discovery issues regarding requests for production of documents, requests for admissions, notice of taking deposition	JFC	1.20
08/23/12	Revise discovery and initial disclosures	JDP	0.90
08/23/12	Review edits to discovery requests	JFC	0.80
08/24/12	Memo regarding upcoming deadlines and hearing dates under the scheduling order	JDP	0.30
08/27/12	Final edits to document requests, interrogatories and requests for admission and prepare service; continue to work on Rule 26(a) disclosures; draft letter requesting excusal from settlement conference	JDP	3.30
08/27/12	Attention to emails regarding upcoming hearing and discovery schedule; review list of possible individuals with knowledge of claims and defenses; attention to loan file; retrieve names for initial disclosures; review memorandum in support of motion to dismiss and cases cited therein	JFC	2.50
08/28/12	Continuing work on Rule 26(a) disclosures; attention to service; draft responses to defendants' requests for production; prepare materials for status conference; review briefs and summary document	JDP	5.50
08/28/12	Work on discovery issues; review and revise disclosures to be made per rule 26(a); attention to settlement conference order; email from J. Bowen regarding discovery and telephone conference tomorrow; review emails from the clerk, J. Noel; telephone call from J. Bowen; review file for individuals with knowledge of claims and defenses; prepare for status conference	JFC	3.50

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<u>Date</u>	<u>Description</u>	<u>Timekpr</u>	<u>Hours</u>
08/29/12	Attend status conference with Judge Almond; conference with J. Bowen; research and analyze possibility of preliminary injunction; conference with C. Fonda and memo to C. Fonda regarding electronic discovery	JDP	6.10
08/29/12	Prepare for status conference with Judge Lincoln Almand; attend status conference; telephone call to J. Bowen; attention to emails regarding discovery; telephone call from and telephone call to A. Weiner regarding electronic discovery; discussion regarding asset search and electronic discovery; review scheduling order	JFC	4.20
08/30/12	Research privilege issues; investigate O'Brien land transfers; review receivership pleadings;	JDP	2.30
08/30/12	Emails from J. Bowen; attention to asset search issues; telephone call from [REDACTED] regarding asset search; attention to agreement with [REDACTED]; review revised order from the court altering the discovery schedule; evaluate issues regarding [REDACTED]	JFC	2.80
08/31/12	Conference with C. Fonda regarding status of document collection	JDP	0.30
08/31/12	Attention to discovery issues; execute engagement letter for [REDACTED]; review items for response to electronic discovery request; draft of discovery response; review emails from A. Wiener	JFC	2.80

Total Hours for Matter 00051

52.50

Total Time for Matter 00051

\$15,390.00

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Timekeeper Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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**Partners**

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Coffey, James F.	25.50	360.00	9,180.00

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
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**Associates**

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Persky, Jonathan D.	27.00	230.00	6,210.00

Total Time for Matter 00051

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[REDACTED] \$15,390.00

Total for Services

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[REDACTED] \$15,390.00**Summary of Disbursements and Other Charges**

<u>Date</u>	<u>Description</u>	<u>Total</u>
08/02/12	Westlaw	2.25
08/29/12	Filing Fee	50.00
08/29/12	Postage	0.45
08/29/12	Westlaw	55.58
08/30/12	Westlaw	21.95
<b>Total Disbursements and Other Charges</b>		<hr/> \$130.23

Total of This Bill

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[REDACTED] \$15,520.23

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]